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6 Attorneys for Defendant  
SALVADOR ORTIZ-PADILLA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.  
16

Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF  
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective  
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea  
20 hearing currently scheduled for February 20, 2024, may be continued to April 1, 2024, at 9:00  
21 a.m.

22 The parties have been in active plea negotiations regarding a resolution in this case, and  
23 the government has extended a plea agreement in this matter. Counsel for Mr. Ortiz-Padilla has  
24 discussed this plea agreement with Mr. Ortiz-Padilla. Following these discussions, Mr. Ortiz-  
25 Padilla has found it necessary to consult with an immigration attorney in order to more fully  
26 understand the impact of any plea in this case. Mr. Ortiz-Padilla has now met with an  
27 immigration attorney and is in the process of obtaining the answers to his questions. At present,  
28 he requires additional time and opportunity to continue to meet with this attorney and to work

1 with this attorney on issues related to his immigration status. Accordingly, the parties are  
2 requesting to continue the February 20, 2024 change of plea hearing to April 1, 2024, to provide  
3 sufficient time for these continued discussions.

4 The requested continuance is made with the intention of conserving time and resources  
5 for both the parties and the Court. The government is in agreement with this request and the  
6 requested date is a mutually agreeable date for both parties. The parties stipulate that for the  
7 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the  
8 date of this order through April 1, 2024, for defense preparation and investigation, pursuant to 18  
9 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by resetting  
10 the change of plea hearing outweigh the best interest of the public and the defendant in a speedy  
11 trial.

12  
13 Respectfully submitted,

14 HEATHER E. WILLIAMS  
15 Federal Defender

16 Date: February 15, 2024

/s/ Reed Grantham  
17 REED GRANTHAM  
Assistant Federal Defender  
Attorney for Defendant  
18 SALVADOR ORTIZ-PADILLA

19  
20 PHILLIP A. TALBERT  
United States Attorney

21  
22 Date: February 15, 2024

/s/ Justin Gilio  
23 JUSTIN GILIO  
Assistant United States Attorney  
24 Attorney for Plaintiff  
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26  
27  
28

**ORDER**

**IT IS SO ORDERED.** The change of plea hearing currently set for February 20, 2024, is hereby continued to April 1, 2024, at 9:00 a.m.

The time through April 1, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **February 16, 2024**

  
UNITED STATES DISTRICT JUDGE